

INTELEPEER VoIP NUMBERING TRIAL PROPOSAL

Table of Contents

I. Introduction..... 1

II. Eligibility 2

III. Compliance Certification 3

IV. Trial Markets 4

V. Implementation Process 5

INTELEPEER VoIP NUMBERING TRIAL PROPOSAL

I. Introduction

On April 18, 2013, the Federal Communications Commission (“Commission”) adopted an Order expressly waiving Section 52.15(g)(2)(i) of the Commission’s rules for purposes of participating in a limited trial giving certain VoIP providers direct access to numbers (“VoIP Numbering Trial”).¹ The Commission in the *FCC VoIP Numbering Order* limits the VoIP Numbering Trial to VoIP providers that have already sought waivers to obtain direct access to numbers”, and sets forth several conditions of the VoIP Numbering Trial.² Specifically, the Commission orders participating providers to submit a numbering proposal, which (1) includes a certification that the provider will comply with the terms and conditions of the waiver, (2) identifies the rate centers or LATAs in which the provider wishes to have numbers directly assigned, and note how many numbers it proposes to receive as new numbers and to port in from existing or new customers, and (3) describes the phase-in process to implement the trial.³

IntelePeer, Inc. submits this IntelePeer VoIP Numbering Trial Proposal (“Trial Proposal”) to demonstrate its intentions for satisfying each of the conditions outlined by the Commission. At the outset, the Trial Proposal outlines our eligibility for the VoIP Numbering Trial. In addition, IntelePeer includes a certification that IntelePeer will comply with the terms and conditions established by the Commission for this limited waiver. This Trial Proposal also identifies the LATAs in which IntelePeer intends to obtain numbers directly in the VoIP Numbering Trial, along with the amount of numbers in each LATA to be obtained in new blocks of numbers and to be ported in from existing or new customers. Finally, IntelePeer in this Trial Proposal describes its phase-in process to implement the trial. Accordingly, IntelePeer submits this Trial Proposal for comment, and ultimately Commission approval.

¹ *In the Matter of Numbering Policies for Modern Communications*, WC Docket No. 13-97, *IP-Enabled Services*, WC Docket No. 04-36, *Telephone Number Requirements for IP-Enabled Services Providers*, WC Docket No. 07-243, *Telephone Number Portability*, CC Docket No. 95-116, *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, *Connect America Fund*, WC Docket No. 10-90, *Numbering Resource Optimization*, CC Docket No. 99-200, Order, FCC 13-51 (rel. April 19, 2013) (“*FCC VoIP Numbering Order*”).

² *FCC VoIP Numbering Order* at ¶¶ 89, 99-108.

³ *Id.* at ¶ 101.

II. Eligibility

Specifically, the Commission limited the VoIP Numbering Trial to VoIP providers that have already sought waivers to obtain direct access to numbers”.⁴ On March 4, 2005, VoEX, Inc. filed its Petition for Limited Waiver of Section 52.15(g)(2)(i) of the Commission’s Rules Regarding Access to Numbering Resources in CC Docket No. 99-200. VoEX changed its name to IntelePeer, Inc. in a letter filed with the Commission in File No. ITC-214-20030529-00263 on October 18, 2007. Accordingly, IntelePeer indicates with this submission its intention to participate in the VoIP Numbering Trial, based on its Petition for Limited Waiver.

⁴

Id. at ¶ 89.

III. Compliance Certification

CERTIFICATE OF COMPLIANCE

By executing this certificate, I certify that, in its participation in the VoIP Numbering Trial, IntelePeer, Inc. will:

- (i) comply with the FCC's number utilization and optimization requirements;
- (ii) adhere to numbering authority delegated to the states;
- (iii) observe all industry guidelines and practices, including filing NRUF Reports;
- (iv) file requests for numbers with the FCC and state commission at least thirty (30) days prior to requesting numbers from the administrators;
- (v) be capable of providing service within sixty (60) days of activating the numbers requested;
- (vi) maintain at least sixty-five percent (65%) number utilization across its telephone number inventory;
- (v) offer IP interconnection to other carriers and providers;
- (vi) work to ensure that its carrier partners comply with applicable law, including intercarrier compensation obligations;
- (vii) provide state commissions contact information when requesting numbers in that state;
- (viii) consolidate and report all numbers under its own unique OCN;
- (ix) provide customers with the ability to access all N11 numbers in use in a state; and
- (x) maintain the original rate center designation of all numbers in its inventory.

Date: 5/20/13

Signature: 

Title: Chief Financial Officer

Printed Name: Andre Simone

Address: 2855 Campus Drive, Suite 200

City/State: San Mateo, CA 94403

Email: regulatory@intelepeer.com

III. Trial Markets

The Commission asks participating providers to also identify the rate centers or LATAs in which it wishes to have numbers directly assigned to it, and note how many numbers in each rate center or LATA it proposes to receive as new numbers and how many it proposes to port in from existing or new customers.⁵ IntelePeer plans to obtain direct access to numbers in LSAN Rate Center LATA 730. To support its participation in the VoIP Numbering Trial, IntelePeer seeks to execute commercial contracts with a national, IP-enabled, alternate tandem provider, as well as a redundant connection with an RBOC over an IP gateway as further explained in Section V. below. If IntelePeer is not successful in establishing such connections to support the VoIP Numbering Trial, then IntelePeer may have to switch locations to obtain direct access to numbers to Miami Rate Center in LATA 46.

IV. Implementation Process

The Commission asks participating providers to describe the phase-in process to implement the trial.⁶ IntelePeer outlines its intentions in this Trial Proposal for participating in the VoIP Numbering Trial. However, IntelePeer anticipates being confronted by unexpected hurdles during our participation in the VoIP Numbering Trial, and may need to re-evaluate and revise its initial plan outlined in this Trial Proposal based on what we learn. This Section V. outlines our initial plan for our Trial Proposal, with additional explanations of how we plan to satisfy the remaining conditions of the VoIP Numbering Trial.

A. Technical Configuration

IntelePeer intends to create its own Local Routing Number (“LRN”) under its existing Operating Company Number for calls to route in the VoIP Numbering Trial.⁷ IntelePeer will establish (or maintain) direct connections over IP to exchange traffic with any carriers and providers interested in establishing such connections pursuant to new

⁵ Id. at ¶ 101.

⁶ Id. at ¶ 101.

⁷ IntelePeer already has OCN (7337) and FRN (0009-0341-82) numbers to support the carrier side of our business, which we plan to use to support our participation in the VoIP Numbering Trials. IntelePeer also has an existing subscription to the LERG, which we can rely on for our trial participation.

(or existing) commercial agreements. For any traffic not exchanged through the IP interconnection, IntelePeer intends to solicit a commercial arrangement with a national, IP-enabled, alternate tandem provider, as well as a redundant connection with an RBOC over an IP gateway to designate the switch of such carriers behind IntelePeer's LRN in the appropriate numbering systems and databases, including the LERG and NPAC, as the default routing location for traffic bound to IntelePeer to route PSTN-originated calls.⁸ IntelePeer will report all numbers for the VoIP Numbering Trial under its own OCN as well.

B. Testing Phases

IntelePeer will conduct the trial using a phased-in approach. The first phase will be for alpha-testing internal IntelePeer numbers. IntelePeer will file a request for numbers with the FCC and applicable state commission (including contact information on the request) at least thirty (30) days prior to requesting numbers from administrators. After this period expires, IntelePeer will begin by requesting a 1,000 block of numbers from the numbering administrators, and assigning 10 new numbers to some of its employees. In addition, IntelePeer will port in one employee number and port out one employee number. After addressing any technical issues identified with these efforts, IntelePeer will conclude the Alpha Phase by assigning 50 additional employee numbers.

Upon conclusion of Alpha Phase, IntelePeer will begin the Beta Phase, which will focus on porting and assigning numbers for several external interconnected VoIP customers, chosen to participate in this Trial. IntelePeer will begin the Beta Phase by assigning new numbers as requested by the participating customers. Once that portion of the Beta Phase is completed in a manner satisfactory to our customers, we will port in and out as many numbers as needed by the customers, within the confines of the VoIP Numbering Trial.⁹

C. Trial Compliance

IntelePeer will comply with the state and federal regulatory numbering requirements, and any applicable industry guidelines and practices, as well as contract with our carrier and provider partners to do the same. IntelePeer will provide service

⁸ See Id. at ¶¶ 41-42.

⁹ See Id. at ¶ 100.

within sixty (60) days of activating the numbers requested, and will seek to maintain at least sixty-five percent (65%) number utilization across its telephone number inventory. For the purposes of this VoIP Numbering Trial, IntelePeer Provide state commission with contact information when requesting numbers. Finally, IntelePeer will provide customers with the ability to access all N11 numbers in use in any state in which IntelePeer has obtained numbers, and will maintain the original rate center designation of all numbers in its inventory.